

Annual 47 C.F.R. § 64.2009fe) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: February 03, 2012

Name of company covered by this certification: **Broadcore, Inc.**

Form 499 Filer 1D: **827368**

Name of signatory: Mahmoud (David) R. Hajian


Title of signatory: SVP Operations and CFO

I David R. Hajian, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed: 

Date: 02-03-2012

CPNI Corporate Certification

CPNI Policy Statement

I, David R. Hajian, SVP Operations and CFO, am a corporate officer of Broadcore, Inc. Pursuant to 47 U.S.C. § 222; 47 C.F.R. §64.2009 of the Communications Act, I hereby state that I am responsible for company compliance with the FCC's CPNI rules and have personal knowledge that Broadcore, Inc. is in compliance with the rules. Broadcore, Inc.'s compliance is demonstrated in this CPNI Policy Statement.

I attest to the following:

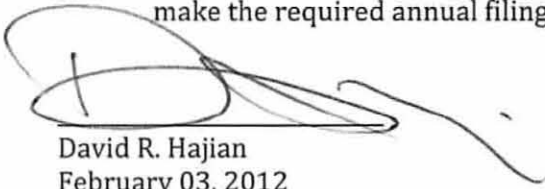
1. Our company utilizes an employee training program with a supervisory review process, to ensure compliance with CPNI rules and regulations.
2. Our company maintains records of compliance for the minimum period as required by FCC rules and regulations.
3. Our company has a supervisory approval process in place for any proposed outbound marketing request for CPNI.
4. Our company has a notification process in place to alert law enforcement, the FCC and affected customers in the event of a CPNI breach.
5. Our company has a notification process in place for immediate notice to customers when a customer initiated password or back-up for forgotten passwords; an on-line account; or the address of record is created or changed.
6. Our company has a formal process in place to certify that CPNI protection policies have been instituted by our applicable vendors, service bureaus and wholesale carriers.



David R. Hajian
February 03, 2012

CPNI Checklist

- Broadcore secures its clients' approval to use CPNI for marketing purposes between itself and its affiliates, through the Master Service Agreement, with the clients' always retaining the option to opt out.
- Broadcore's Policy Manual(s) has/have been updated to include CPNI.
- Employees have been trained on the FCC CPNI rules and Broadcore's penalties for non-compliance, and their signed acknowledgements have been obtained and filed.
- Employees who might need to access Customer Service Records (CSR) stored in the OSS of other carriers/service providers have been provided a copy of Broadcore's CSR Policy, including penalties for non-compliance, and their signed acknowledgements have been obtained and filed. (CSR Policy must require written customer authorization prior to accessing CSR data as part of the new customer sales procedure).
- Broadcore requires written approval for release of CPNI to third parties.
- Customer Notice and Authorization forms are readily available to Company employees / Compliance Officer for distribution to customers upon request
- Broadcore has chosen not to use authorized CPNI for marketing at this time but has customer approval to do so through its Master Service Agreement with all clients, should that policy change.
- Broadcore has provided one-time notification to customers for use of CPNI
- Safeguards are in place with all third parties having access to Broadcore customer data or responsibility for creation of Broadcore customer data. All applicable parties have attested to their compliance with FCC CPNI Rules and their attestations are on file.
- Safeguards are in place to obtain the explicit consent of a customer before disclosing a customer's CPNI to a joint venture partner or independent contractor for the purpose of marketing communications-related services to that customer.
- A Corporate Officer has been named as the Broadcore CPNI Compliance Officer and will certify annually that Broadcore, Inc. is in compliance with all Federal CPNI rules and will make the required annual filing to the FCC.



David R. Hajian
February 03, 2012